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May 31, 2006

Mary L. Cottrell, Secretary  
Department of Telecommunications and Energy  
One South Station, 2<sup>nd</sup> Floor  
Boston, MA 02110

Re: Bay State Gas Company, D.T.E. 06-31

Dear Ms. Cottrell:

On behalf of NSTAR Gas Company ("NSTAR Gas"), please find attached a Petition of NSTAR Gas Company for Limited Participant Status (the "Petition") in the above-referenced proceeding. I have confirmed with counsel for Bay State Gas Company ("Bay State") that Bay State does not object to the NSTAR Gas Petition.

Thank you for your consideration of this matter. Please contact me if you have any questions regarding the Petition.

Very truly yours,

  
John K. Habib

cc: Caroline Bulger, Hearing Officer  
A. John Sullivan  
Andreas Thanos  
Patricia M. French, Esq.  
Robert L. Dewees, Jr., Esq.  
Service List

**COMMONWEALTH OF MASSACHUSETTS**  
**DEPARTMENT OF TELECOMMUNICATIONS AND ENERGY**

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Bay State Gas Company )  
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D.T.E. 06-31

**PETITION OF NSTAR GAS COMPANY FOR LIMITED PARTICIPANT  
STATUS**

Pursuant to 220 C.M.R. 1.03, NSTAR Gas Company ("NSTAR Gas" or the "Company") hereby petitions the Department of Telecommunications and Energy (the "Department") to participate in the above-captioned proceeding as a Limited Participant.

In support of its petition, NSTAR Gas states the following:

1. NSTAR Gas is a Massachusetts gas company as defined by G.L. c. 164, § 1, distributing gas in cities and towns located throughout eastern Massachusetts.

NSTAR Gas' principal place of business is:

NSTAR Gas Company  
800 Boylston Street, 17<sup>th</sup> Floor  
Boston, MA 02199

2. On March 24, 2006, the Department of Telecommunications and Energy (the "Department") issued an Order Opening Investigation (the "Order") to determine whether Bay State Gas Company ("Bay State") complies with the staffing level requirements of G.L. c. 164, § 1E ("Section 1E"). The investigation was docketed by the Department as D.T.E. 06-36. Bay State filed a petition for determination of compliance with Section 1E on April 18, 2006, in response to the Order.

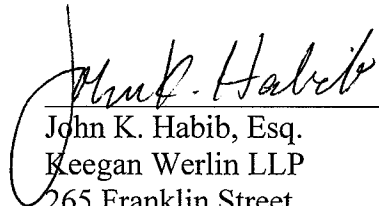
3. The Department's investigation in this proceeding may raise substantial ratemaking and service quality-related issues that are common to other gas companies in Massachusetts, including NSTAR Gas.
4. Good cause exists for allowing this Petition because: (1) the procedural conference has not yet been held; (2) NSTAR Gas' Limited Participant status will not jeopardize the Department's investigation in any material way; (3) NSTAR Gas was a party to D.T.E. 05-27, which is the docket underlying the Department's investigation in the present docket; and (3) the Company has contacted counsel for Bay State concerning its interest in this case and can represent that Bay State does not object to NSTAR Gas being granted Limited Participant status.
5. Accordingly, NSTAR Gas seeks to participate in this proceeding as a Limited Participant with rights to receive copies of all pleadings, discovery requests and responses and to file brief(s) in accordance with the procedural schedule to be established by the Department.

**WHEREFORE**, for the reasons stated above, NSTAR Gas respectfully requests this Petition for Limited Participant status be granted.

Respectfully submitted,

**NSTAR GAS COMPANY**

By its attorney,



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Date: May 31, 2006